

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NORTHEASTERN DIVISION

UNITED STATES OF AMERICA)	<u>Under Seal</u>
)	
)	No. 2:19-cr-00013
v.)	
)	Chief Judge Crenshaw
)	
GEORGIANNA A.M. GIAMPIETRO)	

NOTICE RE: DISCOVERY

The United States, through the United States Attorney for the Middle District of Tennessee, and in response to the Court's Order (D.E. 61), hereby notices the Court of the discovery that has been provided to date, has been made available to the defendant, and / or is being made available to the defendant as of the date of the status hearing scheduled for November 13, 2019. The government requests leave to supplement and amend as necessary.

Specifically, the government has provided the contents of "Production 1," described below, and has prepared and made available the contents of "Production 2," as further set forth herein.¹ A supplement to Production 2 is also anticipated prior to the scheduled status hearing, which is identified in the list below, as are recordings, which have been arranged to be reviewed by the defendant and her counsel beginning after the status hearing.

Production 1 – (consists of a single flash drive):

- The contents of GIAMPIETRO's Facebook accounts, obtained after the execution of a federal search warrant issued by U.S. Magistrate Judge Alistair Newbern on July 3, 2018;
- The contents of GIAMPIETRO's Instagram accounts, obtained after the

¹ Production 1 contents are subject to a protective order, and a similar order is anticipated with the contents of Production 2 once finalized with the defense on this date.

execution of a federal search warrant issued by U.S. Magistrate Judge Alistair Newbern on July 3, 2018

- The contents of additional Instagram accounts associated with GIAMPIETRO, obtained after the execution of a federal search warrant issued by U.S. Magistrate Judge Alistair Newbern on July 11, 2018
- The contents of GIAMPIETRO's Google Cloud account (associated with email address gergiannagiampieto@gmail.com), obtained after the execution of a federal search warrant issued by U.S. Magistrate Judge Alistair Newbern on March 1, 2019
- The contents of GIAMPIETRO's Samsung S5 cell phone, obtained after the execution of a federal search warrant issued by U.S. Magistrate Judge Alistair Newbern on October 22, 2018
- The contents of GIAMPIETRO's Samsung S8 cell phone, obtained after the execution of a federal search warrant issued by U.S. Magistrate Judge Alistair Newbern on October 22, 2018
- The contents of GIAMPIETRO's laptop computer, obtained after the execution of a federal search warrant issued by U.S. Magistrate Judge Alistair Newbern on October 22, 2018
- The contents of four thumb drives, obtained after the execution of a federal search warrant issued by U.S. Magistrate Judge Alistair Newbern on October 22, 2018
- A redacted transcript of an interview of GIAMPIETRO on October 23, 2018, conducted in connection with the execution of a search warrant at her residence on that date

Production 2 – (consists of six (6) binders, which include eight (8) discs):

- 1 Disc with Content of Tablet (30 GB)
- Search Warrant Affidavit for Facebook accounts is available for inspection and review
- Search Warrant Affidavit for Instagram accounts is available for inspection and review
- Search Warrant Affidavit for Google account is available for inspection and review

- Search Warrant Affidavit for Giampietro's Residence is available for inspection and review
- Subpoena results from social media, telephone, education, financial, and other providers (Binders 1, 2, and 3 that include 7 discs)
- Case Initiation Report
- Report of Online Communications with Giampietro October 2015
- Report of Online Communications with Giampietro November 2016
- Report of Online Activity of Giampietro February 2016
- Report of Online Activity of Giampietro March 2016
- Report of Online Communications with Giampietro June 2016
- Report of Online Communications with Giampietro June 2016
- Report of Online Communications with Giampietro March-April 2017
- Report of Private Chats with Giampietro May 2016
- Report of Text Messages with Giampietro November 2017
- Report of Undercover Meeting with Giampietro November 2017
- Report of Undercover Meeting with Giampietro February 2018 (part 1)
- Report of Undercover Meeting with Giampietro February 2018 (part 2)
- Report of Online Chat with Giampietro September 26, 2018
 - Copies of messages to be available on November 13, 2019
- Report of Online Chat with Giampietro September 23-24, 2018
 - Copies of messages to be available on November 13, 2019
- Online Communications with @Alsadaqahsyria October 2018
- Report of Online Chat with Giampietro September 30, 2018
 - Copies of messages to be available on November 13, 2019
- Report of Online Chat with Giampietro October 1-2, 2018

- Copies of messages to be available on November 13, 2019
- Report of Online Chat with Giampietro October 3-4, 2018
 - Copies of messages to be available on November 13, 2019
- Online Chat with Giampietro October 11, 2018
- Documenting Photographs Obtained During Search of Giampietro's Residence
- Report of Online Communication with Giampietro Between May 3, 2018 and September 12, 2018
 - Copies of messages to be available on November 13, 2019
- Proffer with Giampietro December 2018
- Report of Interview of Giampietro October 2018 (part 1)
- Report of Interview of Giampietro October 2018 (part 2)
- Journal Excerpt from Evidence Collected at Giampietro's Residence
- Deleted Messages Found on Giampietro's Cell Phone
- Online Post Made by Giampietro Warning Followers Found on Cell Phone
- Open Source Information on Al-Sadaqah
- Text Messages Obtained Between Giampietro and a Chat Group Associate
- Reverse Proffer with Giampietro in April 2019
- Online Warning Found on Giampietro's Cell Phone
- Search Warrant Return from Search of Giampietro's Residence October 2018
- Documents Relating to Physical Surveillance Conducted During the Course of Investigation Documents
- All Physical Evidence Collected from Giampietro's Residence is available for inspection and review
- Physical Evidence that Giampietro Gave to the Undercover Employee is available for inspection and review

- Audio Recordings of Meetings Between Giampietro and the Undercover Employee have been made available for review at the USAO beginning November 14, 2019
 - Meeting on November 28, 2017
 - Meeting on February 22, 2018
 - Meeting on March 17-18, 2018
 - Meeting on June 25, 2018

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on November 12, 2019, I have forwarded a copy of the foregoing document, via electronic mail, to Peter J. Strianse, Esq., and Charles D. Swift, Esq., counsel for the defendant.

s/ Philip H. Wehby
PHILIP H. WEHBY
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